

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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OSITA EMMANUEL OKOCHA

Plaintiff

-against-

TRANS UNION, LLC; EXPERIAN INFORMATION
SOLOUTION, INC.; and EQUIFAX INFORMATION
SERVICE, LLC,

Defendants
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:
: **Civil Action No.: 08-cv-3107 (DLI)**

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: **DECLARATION OF**
: **O. VALENTINE NNEBE**

O. VALENTINE NNEBE, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am the attorney for the Plaintiff in the above captioned matter and submit this declaration in Plaintiff's opposition to Defendants Trans Union LLC ("Trans Union"), Experian Information Solutions, Inc. ("Experian"), and Equifax Information Services LLC ("Equifax"), (collectively "Defendants" or "CRAs") motion for summary judgment.

2. Attached as **Exhibit 1** is a true and correct copy of the relevant portions of the deposition transcript of Plaintiff Osita Emmanuel Okocha (referred in Plaintiff's opposition papers as "*Plt. Dep. ____*").

3. Attached as **Exhibit 2** is a true and correct copy of the relevant portions of the deposition transcript of Defendant Experian employee Kimberly Hughes (referred in Plaintiff's opposition papers as "*Hughes Dep. ____*").

4. Attached as **Exhibit 3** is a true and correct copy of the relevant portions of the deposition transcript of Defendant Equifax employee Tina Sapere (referred in Plaintiff's opposition papers as "*Sapere Dep. ____*").

5. Attached as **Exhibit 4** is a true and correct copy of the relevant portions of the deposition transcript of Defendant Trans Union employee Steven Newnom (referred in Plaintiff's opposition papers as "*Newnom Dep. ____*").

6. Attached as **Exhibit 5** is a true and correct copy of the relevant portions of the deposition transcript of Mark Rosenbaum (referred in Plaintiff's opposition papers as "*Rosenbaum Dep.*___").

7. Attached as **Exhibit 6** is a true and correct copy of the relevant portions of the deposition transcript of Emmanuel Nwokedi (referred in Plaintiff's opposition papers as "*Nwokedi Dep.*___").

8. Attached as **Exhibit 7** is a true and correct copy of the relevant portions of the deposition transcript of Stella Emeagwali (referred in Plaintiff's opposition papers as "*Emeagwali Dep.*___").

9. Attached as **Exhibit 8** is a true and correct copy of the relevant portions of the deposition transcript of HSBC Card Services employee Theresa Nylund¹ (referred in Plaintiff's opposition papers as "*Nylund Dep.*___").

10. Attached as **Exhibit 9** is a true and correct copy of the declaration of HSBC Card Services employee Theresa Nylund relating to HSBC Card Services investigation of Plaintiff's disputes referred to it by the CRAs through their ACDV.

11. Attached as **Exhibit 10** are Plaintiff's disputes letters to Equifax, dated 9/16/05, 10/6/06, 11/1/06, 12/7/06, and 4/17/08,

12. Attached as **Exhibit 11** are Equifax's ACIS function screen printout and ACDVs relating to Plaintiff's dispute to Equifax, produced by Equifax in this litigation.

13. Attached as **Exhibit 12** are Plaintiff's disputes letters dated 2/25/07, 9/16/05, 10/6/06, 11/1/06, 12/7/06, 3/12/08, and 4/17/08, to and/or copied to Experian.

14. Attached as **Exhibit 13** are Experian ACDVs relating to Plaintiff's dispute to Experian, produced by Experian in this litigation.

15. Attached as **Exhibit 14** are Plaintiff's disputes letters to Trans Union dated 9/16/05, 10/6/2006, 11/1/06, 12/7/06, 3/12/2008, and 4/17/2008, produced by Trans Union in this litigation.

16. Attached as **Exhibit 15** are Trans Union's ACDVs relating to Plaintiff's dispute to Trans

¹ The deposition (and the declaration, Exhibit 10) was had in a different but related lawsuit by the plaintiff against HSBC in the Southern District of New York, Docket No. 08-CV-8107 (relating to the HSBC's furnishing of information to the CRAs).

Union, produced by Trans Union in this litigation.

17. Attached as **Exhibit 16** is Plaintiff's Credit Reports.

18. Attached as **Exhibit 17** is the summary judgment Memorandum and Order of Judge Kaplan dated 3/25/10 in Okocha v. HSBC, Docket NO. 08-cv-8107.

19. Attached as **Exhibit 18** are documents relating to Plaintiff's application for credits.

20. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Brooklyn, New York
July 1, 2010

/s/O. Valentine Nnebe
O. Valentine Nnebe, Esq.